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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/18/2022

70
years

November 16, 2022

VIA ECF

Honorable Sarah Netburn
United States District Court United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, New York 10007

*Re: In Re Terrorist Attacks of September 11, 2001
03 MDL 1570
02 CV 6977, Ashton v. Al Qaeda, et al.
02 CV 7230, Burlingame v. Bin Laden, et al.*

Dear Judge Netburn,

On August 12, 2022, our office filed a Motion for Final Judgments Against the Taliban on behalf of certain *Burlingame* Plaintiffs, as listed in Exhibits A-1, A-2, B-1 and B-2 to the Declaration of Frank H. Granito, III, Esq. (the “Granito Declaration”) and referred to as the “*Burlingame* Plaintiffs.” See 03-md-1570 (S.D.N.Y.)(GBD)(SN), Doc Nos. 8335 (Burlingame Plaintiff’s Motion for Final Judgments Against the Taliban); 8337 (Granito Decl.); 8337-1 (Exhibit A-1 to the Granito Decl.); 8337-2 (Exhibit A-2 to the Granito Decl.); 8337-3 (Exhibit B-1 to the Granito Decl.) and 8337-4 (Exhibit B-2 to the Granito Decl.).

In Exhibit B-1, where the information provided to the Court included the prior solatium damages award amount, the compensatory damages and the treble damages sought under the ATA, for two plaintiffs the damages amounts were inadvertently omitted. ECF No. 8337-3 at lines 56, 74. While Exhibit B-1 identified the additional information required for these two plaintiffs as set forth in this Court’s order (ECF No. 8198), such as the ECF numbers of their liability judgments, prior damage judgments, plaintiffs’ nationality, etc., Exhibit B-1 should have included the separate damages amounts. The amounts are included in the corrected Exhibit B-1 attached hereto.

Additionally, Exhibits A-1, A-2, B-1 and B-2, contain minor clerical and/or typographical errors where the referenced ECF numbers for some of the plaintiffs’ prior damages judgments were listed incorrectly. The corrections requested by the *Burlingame* Plaintiffs are simply clerical in nature and will not change the Court’s disposition of their pending motion.

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We have therefore prepared amended Exhibits A-1, A-2, B1 and B-2 and ask that when this Court considers the *Burlingame* motion or enters an Order on the relief requested in the MDL docket at ECF Doc. No. 8335, that the Court rely on the attached corrected Exhibits A-1, A-2, B-1 and B-2 filed with this letter, substituting for ECF Doc. Nos. 8337-1, 8337-2, 8337-3 and 8337-4.

If the Court should need any additional information, please contact the undersigned. Thank you and best regards.

Respectfully,



Frank H. Granito

The Burlingame Plaintiffs' request is granted. The Court will consider the corrected exhibits at 8755-1, 8755-2, 8755-3, and 8755-4 in connection with the Motion for Final Judgments Against the Taliban, ECF No. 8335, in place of the original exhibits at 8337-1, 8337-2, 8337-3, and 8337-4.

SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

Dated: November 18, 2022
New York, New York